

AO 91 (Rev. 11/11) Criminal Complaint

UNITED STATES DISTRICT COURT

for the

Southern District of Ohio

United States of America

v.

William D. Sheets II

Case No.

2:20-mj-100

Defendant(s)

CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of January 2nd - January 31st, 2020 in the county of Delaware in the
Southern District of Ohio, the defendant(s) violated:

Code Section

Offense Description

Title 18 USC 471 & 472

Knowingly and intentionally, with the intent to defraud, manufacture, pass,
possess counterfeit currency.

This criminal complaint is based on these facts:

See Attached Affidavit, incorporated by reference herein.

☒ Continued on the attached sheet.

TFO C.C. Gannon

Complainant's signature

C.C. Gannon, USSS Task Force Officer

Printed name and title

Sworn to before me and signed in my presence.

Date: 02/12/2020

City and state: Columbus, Ohio



AFFIDAVIT FOR ARREST

I, C.C. Gannon, a Task Force Officer with the United States Secret Service, hereinafter referred to as the Affiant, being duly sworn, depose as follows:

I. INTRODUCTION

1. I am currently employed by the Delaware County Sheriff's Office and assigned to the Columbus Resident Office of the United States Secret Service as a Task Force Officer (TFO). I have been employed by Delaware County Sheriff's Office for 17 years and 11 months and assigned to the USSS for approximately 7 years. I have completed the Ohio Peace Officers Training Academy (OPOTA) and specialized investigations training through OPOTA. As a Deputy Sheriff, Detective, and Task Force Officer, my responsibilities include criminal investigations involving financial crimes, manufacturing, possession, and uttering of counterfeit currency and other violations with a nexus to the U.S. Secret Service.

II. PURPOSE OF AFFIDAVIT

1. A criminal investigation is currently being conducted regarding the manufacturing and uttering of counterfeit United States Currency. In violation of 18 U.S.C. 471 and 18 U.S.C. 472.
2. The facts and information contained herein are based on my personal knowledge and experience, and that of other law enforcement personnel, and from persons with knowledge regarding the relevant facts and witnesses. This affidavit is intended to show only that there is sufficient probable cause for the requested warrant and does not set forth all of my knowledge about this matter.

III. THE INVESTIGATION

1. This investigation began on or about January 13th, 2020 when the Delaware County Sheriff's Office (DCSO) responded to the Pilot Travel Centers, 7680 St. Rt. 37 East Sunbury, OH 43074 on a report of a white male about 30-40 years old with dark color facial hair and a black coat who got out of a Toyota 4-Runner and attempted to pass a counterfeit \$20 Federal Reserve Note (FRN). Upon arriving at the store, the Deputy was unable to recover the note as the employee told the suspect that it was fake and gave it back to him. The suspect was later identified as William D. Sheets II (Sheets).
2. Once Sheets was identified, I was able to determine that Sheets had previously passed counterfeit \$20 FRN's on the following dates and locations:
3. On January 3rd, 2020, William D. Sheets II passed two counterfeit \$20 FRN's at the Wendy's located at 2065 US 23 North Delaware, OH. One of the counterfeit \$20 FRN's was passed in the drive-thru and one was passed inside the store. The counterfeit \$20 FRN's were destroyed by the Manager, however before destroying them, she did take a photo of the notes. The two counterfeit \$20 FRN's were bearing serial numbers ND08788944C and ND64510427B. There is video surveillance of Sheets passing the notes inside the store.
4. On January 3rd, 2020 William D. Sheets II also passed one counterfeit \$20 FRN at Certified Gas Station located at 2061 US 23 North Delaware, OH. The counterfeit \$20 FRN was bearing serial number ND64510427B. There is video surveillance of Sheets passing the note.

5. On January 4th, 2020 William D. Sheets II also passed one counterfeit \$20 FRN at Certified Gas Station located at 2061 US 23 North Delaware, OH. The counterfeit \$20 FRN was bearing serial number ND45812961B. There is video surveillance of Sheets passing the note.
6. On January 5th, 2020, William D. Sheets II also passed one counterfeit \$20 FRN at the Sunoco located at 111 Superior Street Marion, OH. The counterfeit \$20 FRN was bearing serial number ND07457824C. There is video surveillance of Sheets passing the note.
7. On January 12th, 2020, William D. Sheets II also attempted to pass one counterfeit \$20 FRN at the Pilot Travel Centers located at 7680 St. Rt. 37 East Sunbury, OH. A serial number was not identified as the note was returned to Sheets. There is video surveillance of Sheets attempting to pass the note.
8. On January 24th, 2020, William D. Sheets II again passed one counterfeit \$20 FRN at the Speedway located at 2381 US 23 North Delaware, OH. A serial number was not identified as the note was returned to Sheets. There is video surveillance of Sheets passing the note.
9. On January 25th, 2020, William D. Sheets II again passed one counterfeit \$20 FRN at the Big Lots located at 2081 US 23 North Delaware, OH. The counterfeit \$20 FRN was bearing serial number ID28800662A. This was also the same time that Sheets opened up a Big Lots Reward Card at which time he provided his personal identifying information. There is video surveillance of Sheets passing the note.

10. On January 27th, 2020, William D. Sheets II again attempted to pass one counterfeit \$20 FRN at the Pilot Travel Centers located at 7680 St. Rt. 37 East Sunbury, OH. A serial number was not identified as the note was returned to Sheets. There is video surveillance of Sheets passing the note.
11. On January 29th, 2020, William D. Sheets II again passed one counterfeit \$20 FRN at the Big Lots located at 2081 US 23 North Delaware, OH. The counterfeit \$20 FRN was bearing serial numbers MF17972447J. There is video surveillance of Sheets passing the note.
12. On January 31st, 2020, William D. Sheets II was a passenger in a vehicle stopped by Delaware Police Department. Inside the vehicle they located a black and blue book bag which was determined to belong to Sheets. Inside the book bag was a blank pack of resume white paper, one open box of resume white paper that contained numerous backs of counterfeit \$20 FRN's, a brown purse that contained two counterfeit \$20 FRN's that both were bearing serial numbers MF17972447J, and one HP Tri-color printer Cartridge. Also located in the vehicle were five additional counterfeit \$20 FRN's that were bearing serial numbers ML56984487G, JF14047061D, IA72252056A, ML86527659M, and ND39498346A along with a Big Lots Reward Card that was found to belong to Sheets.
13. Continuing on January 31st, 2020, a Search Warrant was conducted at 796 Prospect Mt. Vernon Road Marion, OH which is where Sheets was temporarily residing. On the outside of the residence three miscellaneous HP printer parts were located along with two pieces of counterfeit trimmings. In a fire pit behind

the residence, there were charred printer parts and charred pieces of counterfeit FRN's that were bearing the following serial numbers: ND07457824C, MD01946549F, ND07457824C, ND64510427B, ND08788945C, ND07457824C, ND46326536B, MJ64264072A, ND46226536B, ML38267537K, MB67734926J, and ND46326536B.

14. On February 3rd, 2020, Sheets was interviewed and acknowledged he had been manufacturing counterfeit \$20 FRN's, and further admitted to destroying the printer and various counterfeit \$20 FRN's in the fire pit. Sheets also admitted to possessing other counterfeit \$20 FRN's, admitted that he was the owner of the black and blue backpack seized in the vehicle stop, and that he had passed counterfeit \$20 FRN's at various locations throughout the Southern District of Ohio. Sheets was shown several video surveillance photos of his passing fraudulent currency, and he positively identified himself in several of the photos.

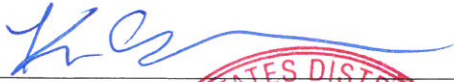
Based on the facts presented above, I believe there is probable cause to show that William D. Sheets II, knowingly and intentionally manufactured, passed, possessed, and was involved with the uttering of counterfeit USC as a scheme or to defraud or for obtaining money or property by means of false or fraudulent pretenses in violations of 18 U.S.C. 471 and 472.

Respectfully submitted,



C.C. Gannon
Task Force Officer
U.S. Secret Service

Sworn to and subscribed before me this 22nd day of February, 2020 at Columbus, Ohio.



Kimberly Jolson
U.S. MAGISTRATE JUDGE

